Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Mark J. Markus, Esq. Law Office of Mark J. Markus 11684 Ventura Blvd. #403 Studio City, CA 91604 818-509-1173 Fax: 818-332-1180 State Bar Number: 152807 CA bklawr@bklaw.com	FOR COURT USE ONLY
☐ Debtor(s) appearing without an attorney  ✓ Attorney for: David Orr	
	ANKRUPTCY COURT FORNIASANTA ANA DIVISION
In re:	CASE NO.: 8:23-bk-10571-SC CHAPTER: 11
The Litigation Practice Group, PC	
	NOTICE OF MOTION FOR ORDER WITHOUT A HEARING
	[LBR 9013-1(p) or (q)]
Debtor(s)	[No hearing required]

# TO THE U.S. TRUSTEE AND ALL PARTIES ENTITLED TO NOTICE, PLEASE TAKE NOTICE THAT:

1. Movant(s) David Orr, filed a motion or application (motion) entitled MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS.

2.	Movant(s) requests that the court grant the motion without a hearing as provided for in:
	☑ LBR 9013-1(p), which, in addition to notice via Notice of Electronic Filing, requires the motion to be served or
	additional parties as specified in LBR 9037-1 ; or
	☐ LBR 9013-1(q), which requires service of the motion only on parties via Notice of Electronic Filing.
3.	The motion is based upon the legal and factual grounds set forth in the motion. (Check appropriate box below):

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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<ul><li>✓ The full motion is attached t</li><li>☐ The full motion has been file sought is attached hereto</li></ul>	•	entry #, and a detailed description of	the relief
4. Movant will promptly lodge an order that the court may use to rule on the motion, as the court may rule on the motion without a hearing and without an opportunity for any party to file a request for a hearing,.			
Date: 2-19-2024 Respectfully submitted,			
		/s/ Mark J. Markus	
		Signature of Movant or attorney for Movar	nt
		Mark J. Markus	
		Printed name of Movant or attorney for Mo	ovant

#### PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11684 Ventura Blvd. #403 Studio City, CA 91604

A true and correct copy of the foregoing document entitled (*specify*): Notice of Motion for Order without Hearing Pursuant to LBR 9013-1(o) will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. <u>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)</u>: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 2-19-2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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Johnny White JWhite@wrslawyers.com, jlee@wrslawyers.com

Service information continued on attached page
------------------------------------------------

2. SERVED BY UNITED STATES MAIL: On (date) 2-19-2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

## Judge:

The Honorable Scott C. Clarkson United States Bankruptcy Court Central District of California Ronald Reagan Federal Building and Courthouse 411 West Fourth Street, Suite 5130 / Courtroom 5C Santa Ana, CA 92701-4593

#### **Debtor**

THE LITIGATION PRACTICE GROUP P.C. 17542 17TH ST, SUITE 100 TUSTIN, CA 92780-1981

## **Debtor's Counsel**

Joon M Khang KHANG & KHANG LLP 4000 Barranca Parkway, Suite 250 Irvine, CA 92604

Chapter 11 Trustee, Richard Marshack Marshack Hays Wood LLP 870 Roosevelt Irvine, CA 92620

# **Counsel for Chapter 11 Trustee Richard Marshack**

**Bradford Barnhardt** Marshack Hays Wood LLP 870 Roosevelt Irvine, CA 92620

#### Office of the US Trustee

United States Trust 411 W Fourth St., S Santa Ana, CA 927	Suite 7160	
		☐ Service information continued on attached page
3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (date), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.		
		Service information continued on attached page
I declare under pen	nalty of perjury under the laws of the U	nited States of America that the foregoing is true and correct.
2-19-2024	Mark J. Markus	/s/ Mark J. Markus
Date	Printed Name	Signature

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Mark J. Markus Law Office of Mark J. Markus 11684 Ventura Bivd. #403 Studio City, CA 91604 818-509-1173 Fax: 818-332-1180	FOR COURT USE ONLY
State Bar Number: 152807 CA bklawr@bklaw.com	
☐ Individual appearing without attorney  ☑ Attorney for Movant David Orr	
CENTRAL DISTRICT OF CALI	ANKRUPTCY COURT FORNIASANTA ANA DIVISION
In re:	CASE NO.: 8:23-bk-10571-SC CHAPTER: 11
The Litigation Practice Group, PC	MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS
Debtor(s)	[No hearing Required]

Movant **David Orr** hereby moves this court, pursuant to 11 U.S.C. § 107(c) and FRBP 9037 for a protective order to restrict public access to filed documents containing personal data identifiers for an individual (including but not limited to, an individual's social security number or tax identification number, financial account numbers, birth dates and/or names of minor children). See also LBR 1002-1(e). Movant further moves that the court authorize the redaction of personal data identifiers from these documents and direct the clerk of the court to restrict public access to these documents as originally filed, whether electronically or manually, so that the personal data identifiers are not available to public access.

Movant hereby certifies that the documents on the attached list containing personal data identifiers were filed on the dates stated below and that public disclosure of personal data identifiers would create undue risk of identity theft or other unlawful injury to the individual or his/her property. (List each document separately and provide the date(s) of filing of the document and its assigned docket entry or claim number(s). You may attach as many continuation pages as necessary.)

I declare under penalty of perjury that the foregoing is true and correct.

2/19/24	
- / / -	David
Date	Printe

Printed name of Movant

Signature of Movant

This form is optional. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

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# ATTACHMENT TO MOTION FOR PROTECTIVE ORDER PURSUANT TO 11 U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA IDENTIFIERS

LIST OF DOCUMENTS IDENTIFIED IN MOTION TO BE REDACTED AND PUBLIC ACCESS TO BE RESTRICTED.

Docket or Claim No.	Date Filed	Name of Document
697	11/21/2023	Entire Exhibit "2"(pp. 19 to 23 of pdf file) to MOTION FOR ALLOWANCE OF ADMINISTRATIVE CLAIM OF DAVID ORR, ESQ. UNDER 11 U.S.C. 503(b)(1)

#### PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 11684 Ventura Blvd. #403
Studio City, CA 91604

A true and correct copy of the foregoing document entitled (*specify*): MOTION FOR PROTECTIVE ORDER PURSUANT TO 11
U.S.C. § 107(c) AND FRBP 9037 TO RESTRICT ACCESS TO FILED DOCUMENTS CONTAINING PERSONAL DATA

IDENTIFIERS will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. <u>TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)</u>: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On 2-19-2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

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Page 3

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Service information	n continued on	attached page
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## 2. SERVED BY UNITED STATES MAIL:

On 2-19-24 served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

#### Judge:

The Honorable Scott C. Clarkson United States Bankruptcy Court Central District of California

Case 8:23-bk-10571-SC Doc 947 Filed 02/19/24 Entered 02/19/24 11:59:12 Desc Main Document Page 10 of 10

Ronald Reagan Federal Building and Courthouse 411 West Fourth Street, Suite 5130 / Courtroom 5C Santa Ana. CA 92701-4593

#### **Debtor**

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#### **Debtor's Counsel**

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## **Counsel for Chapter 11 Trustee Richard Marshack**

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United States Trus 411 W Fourth St., 3 Santa Ana, CA 927	Suitè 7160	☐ Service information continued on attached page
person or entity se personal delivery, o and/or email as fol	<u>rved)</u> : Pursuant to F.R.Civ.P. 5 and/covernight mail service, or (for those v	T MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each or controlling LBR, on, I served the following persons and/or entities by who consented in writing to such service method), by facsimile transmission tes a declaration that personal delivery on, or overnight mail to, the judge will be filed.
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l declare under per	halty of perjury under the laws of the	United States of America that the foregoing is true and correct.
2-19-2024	Mark J. Markus	/s/ Mark J. Markus
Date	Printed Name	Signature